

# HOLWELL SHUSTER & GOLDBERG LLP

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May 29, 2020

## VIA ELECTRONIC FILING

Hon. Paul G. Gardephe  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: Felipe Arroyo v. Stewart Eckert, 18-cv-5819 (PGG) (JLC)

Dear Judge Gardephe:

We represent Petitioner Felipe Arroyo in the above-referenced matter. Judge Cott issued a Report and Recommendation on May 28, 2020, ECF Dkt. 28, to which we plan to file objections pursuant to Federal Rule of Civil Procedure 72(b)(2). Those objections are currently due on June 11, 2020, as ordered by Judge Cott.

Pursuant to Rule I.D of Your Honor's Individual Rules of Practice, we request a two-week extension of that deadline, such that any objections will be due by **June 25, 2020**. This is Petitioner's first request for an extension of this deadline. We request this extension due to the obligations faced by each of Petitioner's attorneys in their other matters, as well as the effects of the COVID-19 pandemic. Petitioner's counsel at Holwell Shuster & Goldberg LLP is currently assigned to several pressing matters. Petitioner's counsel at the Office of the Appellate Defender has a heavy case load and is responsible for significant supervisory duties in that office.

Respondent agrees to this request on the understanding that any extension will apply to all parties.

Thank you for your consideration in this matter.

Respectfully submitted,

/s/ Evan H. Stein

Evan H. Stein (ES2139)

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CC: Counsel of record